

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,

Plaintiff,

v.

**RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Defendant.

Case No. 3:23-cv-00018-RSB

**JOINT STIPULATION AND ORDER TO SEAL DEFENDANT’S BRIEF IN SUPPORT
OF OMNIBUS MOTION IN LIMINE**

NOW COME Plaintiff and Defendant, by and through undersigned counsel, and stipulate to seal Defendant’s Brief in Support of Omnibus Motion in Limine, ECF No. 112.

Although “[t]here is a general presumption in favor of ‘public access’ to documents in the files of the courts . . . [a] district court has discretion to seal documents when the ‘public’s right of access is outweighed by competing interests.’” *Klon Indus. v. E.I. Du Pont de Nemours & Co.*, No. 3:11-cv-622, 2012 U.S. Dist. LEXIS 55982, at *4 (E.D. Va. Apr. 20, 2012) (quoting *In re Knight Publishing Co.*, 743 F.2d 231, 235 (4th Cir. 1984)). “Before sealing documents, district courts must: ‘(1) provide public notice of the request to seal and allow interested parties a reasonable opportunity to object; (2) consider less drastic alternatives to sealing the documents, and (3) provide specific reasons and factual findings supporting [the] decision to seal the documents and for rejecting the alternatives.’” *Id.* (quoting *Ashcraft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000)). The docketing of this Joint Stipulation to Seal would fulfill the “public

notice” element of the Fourth Circuit’s sealing standard. *See Clehm v. BAE Sys., Inc.*, No. 7:16-cv-12, 2017 U.S. Dist. LEXIS 40326, at *3-4 (W.D. Va. Mar. 21, 2017).

Plaintiff seeks to protect and maintain her identity confidential. Plaintiff filed this action under a pseudonym. ECF No. 21 at 1 n.1. Plaintiff sought leave to proceed under pseudonym, which this Court granted. ECF No. 44. Defendant’s Brief in Support of Omnibus Motion in Limine references highly sensitive and personal information about Plaintiff, including her claimed damages, from Plaintiff’s discovery responses, which were designated as confidential in discovery.

The parties stipulate and agree to seal Defendant’s Brief in Support of Omnibus Motion in Limine, ECF No. 112, for the duration that this matter is active on the docket of this Court and any appeals thereafter.

IT IS SO STIPULATED on December 5, 2024.

Respectfully submitted,

JANE DOE

By: /s/ Devon J. Munro

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THE RECTOR AND VISITORS OF THE
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Counsel for Defendant

IT IS SO ORDERED.

U.S. District Court Judge

Dated: _____

CERTIFICATE OF SERVICE

I, Elizabeth K. Abdnour, counsel for Plaintiff, certify that on December 5, 2024, I filed this document by use of this Court's ECF system, which will serve copies to all counsel of record.

By: /s/ Elizabeth K. Abdnour